

[Submitting counsel below]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

**PLAINTIFF’S REPLY AND SUPPLEMENT
TO PLAINTIFF’S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF EXHIBITS TO
DEFENDANTS’ RULE 702 MOTIONS**

Pursuant to Modified Pretrial Order No. 34, Plaintiff respectfully submits this Reply and Supplement to Plaintiff's unopposed Administrative Motion to File Under Seal Portions of Exhibits to Defendants' Rule 702 Motions. ECF 4464.

Plaintiff submits this Reply and Supplement to alert the Court to material that should be sealed within Defendants' Opposition to Plaintiff's Motion to Exclude Expert Testimony. ECF 4632. Specifically, Exhibit 4 to Defendants' Opposition, filed on the docket at 4632-5, contains the last names of Wave 1 Bellwether Plaintiffs B.L., LCHB128, A.R.2, and WHB 832. *See* Kalonia Decl. ¶ 3. The Court has previously granted plaintiffs in this litigation the option of proceeding anonymously as "plaintiffs" need to proceed anonymously outweighs the prejudice to the defendants and the public's interest in knowing the parties' identities." ECF 174. The names of these Plaintiffs are personally identifiable information which is sealable under the compelling reasons standard. *See* ECF 4464. For the same reasons Plaintiff argued in her initial motion, Plaintiff respectfully requests that portions of Exhibit 4 to Defendants' Opposition that contain Plaintiffs' names be sealed. Accompanying this Reply and Supplement is a revised Proposed Order that modifies ECF 4464-2 to reflect this request.

I. REQUESTED SEALING

The exhibit at issue in this Reply and Supplement is:

Exhibit	Description of Material to Be Sealed
Exhibit 4 to Defendants' Opposition to Plaintiff's Motion to Exclude Expert Testimony (ECF 4632-5)	The last names of Wave 1 Bellwether Plaintiffs B.L., LCHB128, A.R.2, and WHB 832 at pp. 57, 59, 62, and 66.

II. CONCLUSION

For the foregoing reasons, including those articulated in ECF 4464, Plaintiff respectfully requests the Court order that the portions of the exhibit listed above be maintained under seal.

Dated: December 15, 2025

Respectfully submitted,

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FILER'S ATTESTATION

I, Andrew Kaufman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: December 15, 2025

/s/ Andrew Kaufman
Andrew Kaufman